

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TONY KOLE, individually and as President
and Manager of Ghost Industries, LLC, and
GHOST INDUSTRIES, LLC, an Illinois
limited liability company,

Plaintiffs,

v.

No. 11-CV-03871

VILLAGE OF NORRIDGE, an Illinois
municipal corporation, RONALD A.
OPPEDISANO, individually and as President
of the Village of Norridge, JAMES J. JOBE,
Chief of Police of the Village of Norridge,
JUDITH D. BERNARDI, Clerk of Village of
Norridge, URSULA A. KUCHARSKI,
DENNIS H. STEFANOWICZ, DOMINIC
SULIMOWSKI, JACQUELINE GREGORIO,
AND ROBERT MARTWICK, individually
and as Trustees of the Village of the Norridge
and MARK V. CHESTER, individually and as
Village Attorney of the Village of Norridge,

Defendants.

**DEFENDANTS' MOTION TO EXTEND DISCOVERY AND REVISE CASE
MANAGEMENT SCHEDULE**

NOW COME the Defendants, VILLAGE OF NORRIDGE, RONALD A.
OPPEDISANO, JAMES J. JOBE, JUDITH D. BERNARDI, URSULA A. KUCHARSKI,
DENNIS H. STEFANOWICZ, DOMINIC SULIMOWSKI, DOMINIC S. FALAGARIO,
JACQUELINE GREGORIO, ROBERT MARTWICK and MARK V. CHESTER, by and
through their counsel, ANCEL, GLINK, DIAMOND, BUSH, DiCIANNI & KRAFTHEFER,
P.C., and move this Court to extend the time to complete discovery and to revise the current Case
Management Schedule, and in support of that motion, state the following:

1. Before the court is an Amended Complaint brought by plaintiffs, the proprietors of a weapons sales business in the Village of Norridge, which seeks non-monetary relief and damages from defendants involving the licensing of that business. Plaintiffs filed a massive Amended Complaint seeking that relief.

2. Plaintiffs' massive Amended Complaint produced, in kind, a long and involved motion to dismiss, raising that plaintiffs fail to state a claim for relief, that the defendants are entitled to absolute and qualified immunity, and many other issues. The motion is now fully briefed and under advisement with the court. The entire briefing process on the motion lasted from July, 2011, until the filing of defendants' Reply Brief on February 23, 2012.

3. In the interim, on October 26, 2011, the court entered a case management order that closed discovery on April 2, 2012, required the filing of a pretrial order by May 1, 2012, and set a jury trial for July 3, 2012.

4. With the parties not even close to being at issue, there has been no discovery done. Defendants request that the case management order be revised, since a decision on the motion to dismiss could moot the order, particularly since the motion raises important immunity defenses available to the individual defendants.

WHEREFORE, the Defendants pray that this Court reset the Case Management schedule in this case.

/s/ Thomas G. DiCianni

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ANCEL, GLINK, DIAMOND, BUSH, DICIANNI & KRAFTHEFER, P.C.

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CERTIFICATE OF SERVICE

The undersigned, one of the attorneys of record herein, hereby certifies that on March 21, 2012, the foregoing **DEFENDANTS' MOTION TO EXTEND DISCOVERY AND REVISE CASE MANAGEMENT SCHEDULE** was electronically filed with the Clerk of the U.S. District Court using the CM/ECF System, which will send notification of such filing to the following:

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/s/ Thomas G. DiCianni

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